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August 20, 2014

VIA ELECTRONIC MAIL

The Honorable Martin Glenn, U.S.B.J.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
Courtroom 501
New York, NY 10004

Re: *In re: Residential Capital, LLC*,
Bankr. S.D.N.Y. Docket No. 12-12020 (MG)

Dear Judge Glenn:

We serve as co-counsel to the ResCap Borrower Claims Trust (the “Borrower Trust”) in connection with the contested matter of Proofs of Claim filed by Frank and Christina Reed (claim nos. 3708, 3759, 4736 and 4759). Pursuant to the Order of the Court, discovery in this matter is scheduled to end on Friday, August 22, 2014. On Tuesday, August 19, 2014, Mr. Reed served our office with deposition notices for depositions to take place this week. Unfortunately, two of the witnesses, David Cunningham and Lauren Delehey, are not available this week. Both witnesses will be available next week. We have conferred with Mr. Reed and he has agreed that the depositions can go forward next week.

We respectfully request that this Court permit the discovery schedule to be modified to allow the depositions to take place next week. We are not seeking any other modifications to the schedule set by the Court.

Respectfully submitted,



Diane A. Bettino

cc: Frank and Christina Reed, *pro se* (via e-mail)
Jordan Wishnew, Esquire
Barbara Hager, Esquire

/s/Martin Glenn
UNITED STATES BANKRUPTCY JUDGE

MEMORANDUM ENDORSED.
IT IS SO ORDERED. 8/20/14